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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CLARIDAE LTD and MARIA DEL PILAR DE WENETZ FERRER,

Plaintiffs,

V.

14 Civ. 10201 (TPG)

THE REPUBLIC OF ARGENTINA.

Defendant.

REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

In further support of their motion for partial summary judgment, Plaintiffs Claridae Ltd ("Claridae") and Maria del Pilar de Wenetz Ferrer ("Ms. Ferrer" or collectively, "Plaintiffs"), who are non-judgment creditors, join in Section I of the Reply Memorandum Of Law In Further Support Of The Motion By NML Capital, Ltd. For Partial Summary Judgment, dated April 7, 2015 ("Reply Memorandum of Law"), and all declarations submitted in support of the motion, to be filed in *NML Capital*, *Ltd. v. Republic of Argentina*, 14 Civ. 8601 (TPG), since the movants therein also bought bonds issued pursuant to the 1994 FAA, and there is no need to inundate the Court with multiple memoranda of law making the same arguments. Plaintiffs do not join in Section II of the Reply Memorandum of Law because that section is inapplicable to non-

Case 1:14-cv-10201-TPG Document 14 Filed 04/07/15 Page 2 of 2

judgment creditors such as Plaintiffs. Plaintiffs also do not join in Section III of the Reply

Memorandum of Law since the Republic has not challenged Plaintiffs' proof of bond ownership.

Dated: New York, New York April 7, 2015

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